

Hearing Date: April 27, 2023 at 2:00 p.m., prevailing Eastern Time
Objection Deadline: April 19, 2023 at 4:00 p.m., prevailing Eastern Time

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

MADISON SQUARE BOYS & GIRLS CLUB, INC.,¹

Debtor.

Chapter 11

Case No. 22-10910 (SHL)

**NOTICE OF HEARING TO CONSIDER CONDITIONAL APPROVAL OF
DISCLOSURE STATEMENT TO BE HELD ON APRIL 27, 2023**

PLEASE TAKE NOTICE that on April 12, 2023, the above-captioned debtor and debtor in possession (the “Debtor”), filed (a) the *Chapter 11 Plan of Reorganization of Madison Square Boys & Girls Club, Inc.* (as may be amended, supplemented, or modified from time to time, the “Plan”), (b) the *Disclosure Statement for Chapter 11 Plan of Reorganization of Madison Square Boys & Girls Club, Inc.* (as may be amended, supplemented, or modified from time to time, the “Disclosure Statement”), and (c) the *Debtor’s Motion for Entry of an Order (I) Conditionally Approving the Adequacy of the Disclosure Statement; (II) Approving Form of Notices and Ballots; (III) Establishing (A) Solicitation and Voting Procedures and (B) Notice and Objection Procedures for Confirmation; (IV) Scheduling Combined Hearing on Confirmation of Plan of Reorganization and Final Approval of Disclosure Statement; and (V) Granting Related Relief* (the “Solicitation Motion”) with the United States Bankruptcy Court for the Southern District of New York (the “Bankruptcy Court”).

PLEASE TAKE FURTHER NOTICE that a hearing (the “Hearing”) will be held before the Honorable Sean H. Lane, United States Bankruptcy Judge, Bankruptcy Court, 300 Quarropas Street, White Plains, New York 10601 on **April 27, 2023 at 2:00 p.m., prevailing Eastern Time** to consider the entry of an order approving the relief requested in the Solicitation Motion including, among other things, the conditional approval of the Disclosure Statement.

PLEASE TAKE FURTHER NOTICE that the Hearing will be conducted via Zoom for Government. Parties wishing to appear at the Hearing, whether in a “live” or “listen only” capacity, must make an electronic appearance through the “eCourtAppearances” tab on the Bankruptcy Court’s website <https://www.nysb.uscourts.gov/ecourt-appearances> no later than 4:00 p.m. on the business day before the Hearing (*i.e.*, April 26, 2023) (the “Appearance Deadline”). Following the Appearance Deadline, the Bankruptcy Court will circulate by email the Zoom link to the Hearing to those parties who have made an electronic appearance. Parties wishing to appear at the Hearing must submit an electronic appearance through the Bankruptcy Court’s website by the Appearance Deadline and not by emailing or otherwise contacting the Bankruptcy Court.

¹ The last four digits of the Debtor’s federal tax identification number are 6792. The Debtor’s mailing address is 250 Bradhurst Avenue, New York, New York 10039.

Additional information regarding the Bankruptcy Court's Zoom and hearing procedures can be found on the Bankruptcy Court's website.

PLEASE TAKE FURTHER NOTICE that any responses or objections (each, an "Objection") to the relief requested in the Solicitation Motion shall: (a) be in writing; (b) state the name and address of the objecting party and the nature and amount of the Claim of such party; (c) state, with particularity, the legal and factual basis for the Objection and, if practicable, a proposed modification to the Disclosure Statement (or related materials) that would resolve such Objection; and (d) be filed with the Bankruptcy Court (contemporaneously with a proof of service) and served upon the following parties so as to be **actually received** on or before **April 19, 2023 at 4:00 p.m., prevailing Eastern Time** (the "Objection Deadline"):

- (i) the Debtor, Madison Square Boys & Girls Club, Inc., 250 Bradhurst Avenue, New York, New York 10039 (Attn: jdold@madisonsquare.org);
- (ii) counsel to the Debtor, Paul, Weiss, Rifkind, Wharton & Garrison, LLP, 1285 Avenue of the Americas, New York, New York 10019 (Attn: akornberg@paulweiss.com; jweber@paulweiss.com; lliberman@paulweiss.com);
- (iii) the United States Trustee for Region 2, U.S. Department of Justice, Office of the U.S. Trustee, 201 Varick Street, Room 1006, New York, New York 10014 (Attn: Andrea.B.Schwartz@usdoj.gov; Tara.Tiantian@usdoj.gov);
- (vi) counsel to the Official Committee of Unsecured Creditors, Pachulski Stang Ziehl & Jones LLP, 780 Third Avenue, 34th Floor, New York, New York 10017 (Attn: jstang@pszjlaw.com; jlucas@pszjlaw.com; gbrown@pszjlaw.com); and
- (v) counsel to the DIP Lender, FisherBroyles LLP, 445 Park Avenue, New York, NY 10022 (Attn: Cathleen.Allen@FisherBroyles.com; patricia.fugee@FisherBroyles.com)

PLEASE TAKE FURTHER NOTICE that only those Objections timely filed and actually received by the Objection Deadline in accordance with the requirements set forth herein will be considered by the Bankruptcy Court during the Hearing. If no Objections are timely filed and served with respect to the Solicitation Motion, the Debtor may, on or after the Objection Deadline, submit to the Bankruptcy Court an order substantially in the form of the proposed order annexed to the Solicitation Motion, which order may be entered with no further notice or opportunity to be heard.

PLEASE TAKE FURTHER NOTICE that the Hearing may be continued or adjourned thereafter from time to time without further notice other than an announcement of the adjourned date or dates at the Hearing. The Debtor will file an agenda before the Hearing, which may modify or supplement the Solicitation Motion to be heard at the Hearing.

PLEASE TAKE FURTHER NOTICE that *your rights may be affected*. You should read the Plan, Disclosure Statement, and Solicitation Motion carefully and discuss it with your attorney, if you have one. If you do not have an attorney, you may wish to consult with one.

PLEASE TAKE FURTHER NOTICE that copies of the Plan, Disclosure Statement, and Solicitation Motion can be viewed and/or obtained by: (i) accessing the Bankruptcy Court's website at www.nysb.uscourts.gov, or (ii) from the Debtor's claims and noticing agent, Epiq Corporate Restructuring, LLC, at <https://dm.epiq11.com/case/madisonsquare/info>, by calling (866)977-1161 (toll free) for U.S. and Canada-based parties or +1 (503) 597-7709 for international parties, or by email at MadisonSquareInfo@epiqglobal.com. Note that a PACER password is needed to access documents on the Bankruptcy Court's website.

New York, New York
Dated: April 12, 2023

/s/ John T. Weber

Alan W. Kornberg, Esq.

William A. Clareman, Esq.

John T. Weber, Esq.

Leslie E. Liberman, Esq.

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